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November 26, 2002

VIA HAND DELIVERY

Victoria Rutson, Esq.
Chief, Section of Environmental Analysis
Surface Transportation Board
Room 504
1925 K Street, N.W.
Washington, D.C. 20423

ED 34284

**Re: Proposed Rail Line Construction in Medina County, Texas --
Request for Approval of Third Party Consultant**

Dear Ms. Rutson:

We are writing to request your approval, in accordance with 49 C.F.R. §1105.10(d), of an independent third-party consultant to work with your office to prepare the necessary environmental documentation associated with the proposed construction of a rail line in Medina County, Texas by a subsidiary of Vulcan Materials Company ("Vulcan"). The proposed rail line will be approximately seven miles long and will connect a planned limestone quarry to be operated by a different Vulcan subsidiary with the Union Pacific Railroad Company near milepost 250 of UP's Del Rio Subdivision north of Dunlay, Texas. The purpose of the rail line will be to provide rail common carrier transportation for the quarry and for any other industries that may wish to use the line in the future. As advised in our November 22, 2002 pending request for waiver of the six-month pre-filing notice rule in connection with this project, Finance Docket No. 34284 has been reserved for this matter.

The rail line will be operated by a wholly-owned subsidiary of Vulcan Materials that will be incorporated as a common carrier railroad under the rail incorporation laws of the State of Texas. The new railroad company intends to seek appropriate authorization to construct and

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operate the new line either pursuant to the Board's exemption authority under 49 U.S.C. §10502 or pursuant to the terms of 49 U.S.C. §10901.

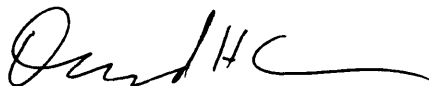
Vulcan proposes that URS Corporation be retained as SEA's third-party consultant. We anticipate that Ms. Jaya Zyman-Ponebshek will head the URS team. Ms. Zyman-Ponebshek and URS are experienced in evaluating the environmental impacts of rail construction projects. We also understand that URS has been identified by SEA as an entity qualified to serve as a third-party consultant for such projects. The contact information for Ms. Zyman-Ponebshek is:

Jaya Zyman-Ponebshek
URS Corporation
US Mail: P.O. Box 201088, Austin, TX 78720-1088
Courier Delivery: 9400 Amberglen Boulevard, Austin, TX 78729
Tel: 512-419-5316
Fax: 512-454-8807
E-mail: jaya_zyman-ponebshek@urscorp.com

We contemplate that URS's work would be performed on behalf of, and at the direction of, the Board pursuant to 49 C.F.R. § 1150.10(d). Further, we propose that URS would undertake this project in accordance with the Board's requirements for disclosure and pursuant to an appropriate memorandum of understanding that would be entered among the Board, URS and the Vulcan rail subsidiary.

We look forward to your response and to answering any questions you might have.

Sincerely,



David Coburn
Sara Beth Watson
Attorneys for Vulcan Materials

cc: Rini Ghosh, Esq.
Mr. Darrell Brownlow